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*Attorneys for Irving H. Picard, Esq., as Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04808 (SMB)

ALAN AND JANET WINTERS FAMILY
PARTNERSHIP LTD.;

WINTERS MANAGEMENT TRUST, in its
capacity as GENERAL PARTNER of the ALAN
AND JANET WINTERS FAMILY
PARTNERSHIP LTD.;

ALAN WINTERS, in his capacity as TRUSTEE of
the WINTERS MANAGEMENT TRUST and
INDIVIDUALLY as SUBSEQUENT
TRANSFeree; and

JANET WINTERS, in her capacity as TRUSTEE
of the WINTERS MANAGEMENT TRUST and
INDIVIDUALLY as SUBSEQUENT
TRANSFeree,

Defendants.

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including May 15, 2015.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

[THIS PORTION IS INTENTIONALLY LEFT BLANK]

Dated: April 24, 2015
New York, New York

By: s/ Nicholas J. Cremona
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*Attorneys for Irving H. Picard, Esq., as Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and Estate of Bernard L. Madoff*

Dated: April 24, 2015
New York, New York

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*Attorneys for Defendants Alan and Janet Winters
Family Partnership, Ltd., Winters Management
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Dated: April 24, 2015
New York, New York

By: s/ Keith N. Costa
Keith N. Costa, Mediator